

of material fact that are properly resolved by a jury. Under controlling Ninth Circuit precedent, summary judgment is inappropriate where credibility is at issue and where circumstantial evidence supports Plaintiff's claims.

II. LEGAL STANDARD

Summary judgment is appropriate only where "there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law." Fed. R. Civ. P. 56(a).

- Courts must view the evidence in the light most favorable to the nonmoving party. *T.W. Elec. Serv., Inc. v. Pacific Elec. Contractors Ass'n*, 809 F.2d 626, 630–31 (9th Cir. 1987).
- Credibility determinations are jury functions, not those of a judge. *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 255 (1986); *DominguezCurry v. Nev. Transp. Dep't*, 424 F.3d 1027, 1036 (9th Cir. 2005).
- Circumstantial evidence and reasonable inferences are sufficient to defeat summary judgment. *McGinest v. GTE Serv. Corp.*, 360 F.3d 1103, 1112 (9th Cir. 2004).
- Procedural irregularities and shifting explanations can demonstrate pretext. *Cornwell v. Electra Cent. Credit Union*, 439 F.3d 1018, 1028 (9th Cir. 2006).

• III. MATERIAL FACTS IN DISPUTE

A. FBI Investigation and Retaliatory RedTagging

The rumor mill had begun earlier. FBI Special Investigator Alley Lopez informed Plaintiff in or about June of 2021 about what her investigation had uncovered. Prior to this disclosure, Plaintiff had no idea what was happening. Plaintiff had a certificate of completion, all abatements had been removed and satisfied, yet the property was frozen under new restrictions. The FBI told Plaintiff directly that he was redtagged just after Bernard Curran was indicted and forced to resign within a day or two.

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This evidence contradicts Defendants' claim of lawful enforcement. Disputes over the legitimacy of government action are jury questions. *Santos v. Gates*, 287 F.3d 846, 851 (9th Cir. 2002). Courts cannot weigh credibility at summary judgment. *Anderson*, 477 U.S. at 255.

B. Obstruction by SFDBI Officials

Joe Duffy ended up with Curran's job. When Plaintiff was first redtagged in May of 2021, he spoke with Mauricio Hernandez, who informed him that he had to go through Joe Duffy. Duffy was on vacation for two weeks. The house was in escrow and due to close in four days, but everyone had to wait for Duffy to return. When Plaintiff finally met with Duffy, he was told to go through Hernandez, who was also on vacation.

These delays and contradictions show pretext. Procedural irregularities are recognized as evidence of discriminatory or retaliatory motive. *Noyes v. Kelly Servs.*, 488 F.3d 1163, 1170 (9th Cir. 2007). See also *Cornwell*, 439 F.3d at 1028 (shifting explanations create triable issues).

C. Inflated Costs and Retaliation

Without Bernie being involved, this project would have taken 10 weeks and approximately \$100,000. Forcing Santos into the mix added another \$140,000 and at least 8 months. Without Bernie or Santos being forced into the project, and then being busted for their crimes, the retaliation would have never begun and dragged out for 7 years.

Evidence of retaliation and collusion is sufficient to defeat summary judgment. *Coszalter v. City of Salem*, 320 F.3d 968, 977 (9th Cir. 2003). See also *Allen v. Iranon*, 283 F.3d 1070, 1077 (9th Cir. 2002) (retaliation claims turn on factual disputes).

D. Falsified Records

Plaintiff has shown that SFDBI records were falsified. Joe Duffy is one of only two people who can change SFDBI records. He cannot change assessor's records, which still show the permit as completed on 8/27/2020.

Falsified records create triable disputes. *Leslie v. Grupo ICA*, 198 F.3d 1152, 1159 (9th Cir. 1999). See also *Reeves v. Sanderson Plumbing Prods., Inc.*, 530 U.S. 133, 150 (2000) (jury may infer unlawful motive from falsification of records).

E. Erroneous Violations and Window Disputes

There were no violations on the property. Multiple inspectors had signed off prior to May of 2021. Mauricio Hernandez wrote up erroneous violations, and Kevin Birmingham was with him that day. The windows were not in violation; they were spec'd by planning. Birmingham knew this but redtagged them anyway. Plaintiff contacted the Board of Supervisors, and Ernest Jones inspected the windows. Joe Duffy refused to budge. Plaintiff recorded the meeting.

Conflicting testimony and documentary evidence preclude summary judgment. *T.W. Elec.*, 809 F.2d at 630–31. See also *Chuang v. Univ. of Cal. Davis*, 225 F.3d 1115, 1127 (9th Cir. 2000) (conflicting evidence creates triable issues).

F. Driveway, Zoning, and Variance Fabrications

Will Huguen never sought to legalize the ADU. Plaintiff was never looking to add a new driveway; he was restoring the original driveway, which neighbors had filled in. Birmingham and Hernandez confirmed it was the original cut. Huguen claimed the property did not fall under Ordinance 9517 but under "Day Law." Robb Kappa at the City Attorney's office confirmed there was no such law. Huguen then claimed the property had been rezoned but never provided documentation.

Arbitrary enforcement and misrepresentation of zoning laws create factual disputes. *Armstrong v. Davis*, 275 F.3d 849, 874 (9th Cir. 2001). See also *Village of Willowbrook v. Olech*, 528 U.S. 562, 565 (2000) (equal protection violated by arbitrary enforcement).

G. Policy Making and Monell Liability

Curran made policy when he forced Plaintiff to hire Santos. Fossi, Hughen, Birmingham, and Duffy also made policy. When Ernest Jones and Plaintiff met with the building department, they proved that windows were legal and approved. Officials stated they did not care and would never sign off on Naples Street. Plaintiff recorded that meeting.

This establishes municipal liability under *Monell v. Dep't of Soc. Servs.*, 436 U.S. 658 (1978). A single decision by a policymaker can establish liability. *Pembaur v. City of Cincinnati*, 475 U.S. 469, 481 (1986). See also *Lytle v. Carl*, 382 F.3d 978, 982 (9th Cir. 2004).

IV. CONCLUSION

Plaintiff has presented substantial evidence, corroborated by public records and sworn testimony, that genuine disputes of material fact exist. Under controlling Ninth Circuit precedent, summary judgment must be denied.

Respectfully submitted,

By: _____
 Patrick Gallagher
 Plaintiff, Self-Represented
 9845 N. 103rd Drive
 Sun City, AZ 85351
 (925) 325-2911
 bigblockpat@gmail.com

DECLARATION OF PLAINTIFF PATRICK GALLAGHER

I, Patrick Gallagher, declare as follows:

1. I am the Plaintiff in this action. I am over the age of 18 years. I have personal knowledge of the facts contained in this declaration, and of called as a witness could and would testify competently to the facts as stated herein.

2. On or about June 2021, FBI Special Investigator Alley Lopez informed me that I had been “redtagged” immediately after Inspector Curran was indicted and forced to resign. At that time, I had already received a certificate of completion and satisfied all abatements, yet my property was frozen under new restrictions. A true and correct copy of the certificate of completion is attached hereto as **Exhibit A**.

3. After being redtagged, I was told by Mauricio Hernandez that I had to go through Joe Duffy, who was on vacation for two weeks. My property was in escrow and due to close in four days, but the closing was delayed. When I finally met with Duffy, he told me to go through Hernandez, who was also on vacation.

4. Without Bernie’s involvement, my project would have taken approximately ten weeks and cost \$100,000. Because Santos was forced into the project, the costs increased by \$140,000 and the timeline was extended by at least eight months. Retaliation then dragged the project out for seven years.

5. SFDBI records were falsified. Joe Duffy is one of only two people who can alter those records, but assessor’s records still show the permit as completed on August 27, 2020. A true and correct copy of the assessor’s worksheet is attached hereto as **Exhibit B**.

6. There were no violations on the property. Multiple inspectors had signed off prior to May 2021. Mauricio Hernandez wrote up erroneous violations, and Kevin Birmingham redtagged windows that had been approved by planning. They also erroneously claimed that I attempted to

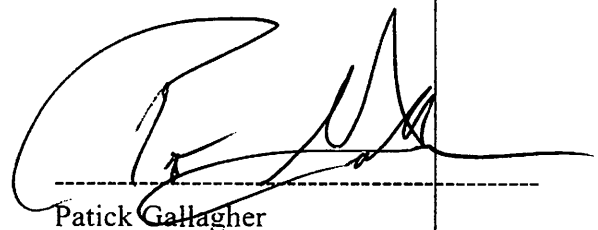
portray the basement of 200 Naples Street as an “ADU.” I contacted the Board of Supervisors, and Ernest Jones inspected the windows. Joe Duffy refused to budge. I recorded the meeting. A true and correct copy of the recording will be made available according to the court’s instructions. **Exhibit C.** *See also, Exhibit-D*, MLS listing with disclosures attached hereto.

7. I sought only to restore the original driveway, which neighbors had filled in. Birmingham and Hernandez confirmed it was the original cut. Will Huguen falsely claimed my property did not fall under Ordinance 9517 but under a nonexistent “Day Law.” He later claimed the property had been rezoned but never provided documentation. A true and correct copy of the email referencing “day law” is attached hereto as **Exhibit-E**.

8. Curran made policy when he forced me to hire Santos. Fossi, Huguen, Birmingham, and Duffy also made policy. When Ernest Jones and I met with the building department, we proved that windows were legal and approved. Officials stated they did not care and would never sign off on Naples Street. I recorded that meeting.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration is executed on

November 23, 2025, at Sun City, Arizona



Patrick Gallagher

CERTIFICATE OF SERVICE

I, (**name**), hereby certify that I am employed by (**name**) and am of such age and discretion as to be competent to serve papers.

I further certify that on this date I caused a copy of Plaintiff's Opposition to Defendants' Motion for Summary Judgment, and Declaration of Patrick Gallagher in Support of Opposition to Defendants' Motion for Summary Judgment to be placed in a postage-paid envelope addressed to the counsel for Defendants at the address stated below and deposited said envelope in the United States mail.

Addressee: David Chiu, City Attorney
Jennifer Choi, Chief Trial Deputy
Hunter W. Sims III, Deputy City Attorney
Fox Plaza 1390 Market Street, Sixth Floor
San Francisco, California 94102-5408

Attorneys for City and County of San Francisco; William Hughen; Kevin Birmingham; Natalia Fossi (Erroneously sued as Natalia Kwaitkowska); Mauricio Hernandez; and Joe Duffy

Dated this 25 day of NOVEMBER, 2025

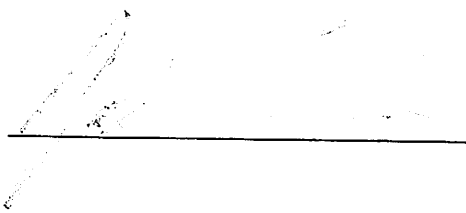
A handwritten signature, possibly reading "Jennifer Choi", is written over a horizontal line.

EXHIBIT A

EXHIBIT A



City and County of San Francisco
Department of Building Inspection

CERTIFICATE OF FINAL COMPLETION AND OCCUPANCY

LOCATION: 200 Naples St (number) 6008/001 (street) (block and lot)

Permit Application No: 201810185006 Type of Construction: W.P. Stories: 2 Dwelling Units: 1

Basements: 0 Occupancy Classification: R-2 No. of Guestrooms: 0 with cooking facilities: 0

Description of Construction: To comply with NOV 2018 9541.1 structural changes, library to include removing & replacing floor trimmer, replace 1 (or) column, add 2 new columns on each side, remove (or) laundry on third floor.

To the best of our knowledge, the construction described above has been completed and, effective as of the date the building permit application was filed, conforms both to the Ordinances of the City and County of San Francisco and to the Laws of the State of California. The above referenced occupancy classification is approved pursuant to Section 109A of the San Francisco Building Code.

Any change in the use or occupancy of these premises—or any change to the building or premises—could cause the property to be in violation of the Municipal Codes of the City and County of San Francisco and, thereby, would invalidate this Certificate of Final Completion and Occupancy. A copy of this Certificate shall be maintained on the premises and shall be available at all times. Another copy of this Certificate should be kept with your important property documents.

Before making any changes to the structure in the future, please contact the Department of Building Inspection, which will provide advice regarding any change that you wish to make and will assist you in making the change in accordance with the Municipal Codes of the City and County of San Francisco.

This certificate issued on: 8/27/2021

by:

(Signature)

Building Inspector

Printed Name

Patrick O'Riordan, Interim Director

(copies: White (original to microfilm), Blue (to property owner), Yellow (to Building Inspector), Pink (to Housing Inspector))

EXHIBIT B

EXHIBIT B



City & County of San Francisco

49 South Van Ness Avenue, San Francisco CA 94103-1226

Date: October 14, 2021

Property Address: 200 NAPLES ST

Block: 6008 Lot: 001 Seq: 00

Director's Order Number: 201644272 - A

**FINAL BILL- Assessment of Costs
Code Violations Outstanding**

To:

MAD SON TRUST CO FBO PATRIC
GALLAGHER PATRICK
PO BOX 523
BURTON CA, 94514

Dear Property Owner(s),

Our records show that all required work has been completed to abate the code enforcement case referenced above. Before the Director's Order of Abatement referenced above can be lifted the final accrual of Assessment of Costs must be paid.

Failure to correct the violations associated with this Director's Order, prior to the **DIRECTOR'S HEARING AND RECORDED ORDER OF ABATEMENT** resulted in the accrual of "ASSESSMENT OF COSTS" pursuant to 102A.3 & 102A.17 of the San Francisco Building Code. Said Code requires that this Department's "cost of preparation for and appearance at the hearing, and all prior and subsequent attendant costs shall be assessed upon the property owner. Said violations will not be deemed legally abated until the property owner makes full payment of the assessment..."

The final Assessment of Cost AMOUNT accrued to date NOW DUE AND PAYABLE is : \$3,043

Payment must be by cashier's check or money order & must be accompanied by this original letter.

Please tender payment by mail (or in person during regular business hours), to the address indicated below:

Assessment of Costs Payment
Department of Building Inspection
Housing Inspection Services
49 South Van Ness Ave. Suite 400
San Francisco CA 94103-1226

Please make all checks payable to City and County of San Francisco Department of Building Inspection or COSF-DBI.

TO AVOID HAVING A LIEN RECORDED UPON YOUR PROPERTY AND LEVIED ON YOUR NEXT PROPERTY TAX BILL it is necessary for you to tender payment immediately.

The Complaint of the Director of the Department of Building Inspection will be lifted, and the structure cited above brought into compliance with the applicable sections of the San Francisco Building and Housing Codes related to this complaint **UPON PAYMENT OF ALL ASSESSMENT OF COSTS** now due.

Please note that this Assessment of Costs does not include costs incurred by the Department as a result of litigation which may be filed by the City against the property owner to compel code compliance. If such litigation is filed by the City, the property owner may be responsible for litigation costs that include, but are not limited to the staff time necessary for trial discovery, depositions, trial, attorney's fees, and civil penalties as provided for by state law & the San Francisco Housing Code.

Housing Inspection Services can be reached at (415) 662-3700 should you have any questions.

Your prompt cooperation on this matter is appreciated.

Patrick O'Riordan, Interim Director
Department of Building Inspection

By: James Lawrie
Housing Inspector

cc: HIS File

Recording Requested by:

CHICAGO TITLE COMPANY

When Recorded Mail to:

Francis Lau
1023 Gilman Drive
Daly City, CA 94015

20189K59248800004

San Francisco Assessor-Recorder

Carmen Chu, Assessor-Recorder

DOC 2018-K592488-00

Acct 2001-Chicago Title Company Concord

Thursday, MAR 22, 2018 11:01:39

Ttl Pd \$4,575.40 Nbr-0005778469

oes/RE/1-4

Assessor Parcel Number (APN): Block 6008 Lot 001Street Address: 200 Naples Street, SF, CA 94112

Grant Deed

(Please fill in Document Title(s) above this line)

This document is exempt from the \$75 Building Homes and Jobs Act Fee (per Government Code §27388.1) because:

- ☒ Document is a transfer of real property subject to the imposition of transfer tax
- ☐ Document is a transfer of real property that is a residential dwelling to an owner-occupier
- ☐ Document is recorded in connection with an exempt transfer of real property (i.e., subject to transfer tax or owner-occupied). If not recorded concurrently, provide recording date and document number of related transfer document:
Recording date _____ Document Number _____
- ☐ The \$225 per transaction cap is reached
- ☐ Document is not related to real property

This page added to provide adequate space for recording information
(additional recording fee applies)

-Property was listed on MLS on 9/3/2020 for \$1,388,000 on 10/13/2020 was revised to \$1,288,000. The listing expired on 12/31/2020.

-It is currently listed again on 3/13/2021 for \$1,250,000. It is marketed as a duplex with an in-law studio on G/F.

[illegible]



City & County of San Francisco
 José Cisneros, Treasurer
 David Augustine, Tax Collector
 Property Tax Bill (Secured)

1 Dr. Carlton B. Goodlett Place
 City Hall, Room 140
 San Francisco, CA 94102
 www.sftreasurer.org

For Fiscal Year July 1, 2019 through June 30, 2020

Vol	Block	Lot	Bill No	Mail Date	Property Location
35	6008	001	20191695160	October 16, 2019	200 NAPLES ST

Assessed on January 1, 2019 at 12:01am

Tax NAME WITHHELD PER CA AB 2238

ADDRESS INFORMATION
 NOT AVAILABLE ONLINE

TOTAL DUE \$11,620.88

1st Installment	2nd Installment
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\$5,810.44	\$5,810.44
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Due 12/10/2019	Due 05/15/2020
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Assessed Value

Description	Full Value
Land	\$705,500
Structure	\$78,500
Fixtures	
Personal Property	
Gross Taxable Value	\$785,000
Less HO Exemption	\$0
Less Other Exemption	\$0
Net Taxable Value	\$785,000

Tax Amount \$9,263.78

Important Messages

TAX DEFAULTED

Direct Charges and Special Assessments

Type	Telephone	Amount Due
45 - Living Wage for Educators 2018 Tax	(415) 355-2203	\$309.52
46 - San Francisco Bay Restoration Authority	(888) 508-8157	\$12.00
55 - Building Inspection	(415) 558-6088	\$1,636.50
69 - SFUSD Facility Dist	(415) 355-2203	\$38.28
97 - SFCCD Parcel Tax	(415) 487-2400	\$99.00
98 - SFUSD Teacher Support	(415) 355-2203	\$261.70

Total Direct Charges and Special Assessments

\$2,357.10

Keep this portion for your records. See back of bill for payment options and additional information.



City & County of San Francisco
 Property Tax Bill (Secured)

Pay online at www.sftreasurer.org

For Fiscal Year July 1, 2019 through June 30, 2020

Vol	Block	Lot	Bill No	Property Location
35	6008	001	20191695160	200 NAPLES ST

- ☐ Check if contribution to Arts Fund is enclosed.
☐ For other donation opportunities go to www.Give2SF.org

Detach stub and return with your payment.

Write your block and lot on your check.

2nd Installment cannot be accepted unless 1st is paid.

San Francisco Tax Collector
 Secured Property Tax
 P.O. Box 7426
 San Francisco, CA 94120-7426

2nd Installment Due

Pay by	May 15, 2020	\$5,810.44
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If paid after	May 15, 2020	\$6,436.48
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Includes 10% penalty and applicable fees

Paid 05/29/2020



City & County of San Francisco
 Property Tax Bill (Secured)

Pay online at www.sftreasurer.org

For Fiscal Year July 1, 2019 through June 30, 2020

Vol	Block	Lot	Bill No	Property Location
36	6008	001	20191695160	200 NAPLES ST

- ☐ Check if contribution to Arts Fund is enclosed.
☐ For other donation opportunities go to www.Give2SF.org

Detach stub and return with your payment.

Write your block and lot on your check.

If property has been sold, please forward bill to new owner.

San Francisco Tax Collector
 Secured Property Tax
 P.O. Box 7426
 San Francisco, CA 94120-7426

1st Installment Due

Pay by	December 10, 2019	\$5,810.44
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If paid after	December 10, 2019	\$6,391.48
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Includes 10% penalty

Paid 01/16/2020



Pat mg <bigblockpat@gmail.com>

Here's some recent communication re releases for City of SF

2 messages

MacKenzie, Kathy <KMacKenzie@ortc.com>
 To: Patrick Gallagher <bigblockpat@gmail.com>

Mon, Sep 9, 2024 at 12:54 PM

On 8/1/2024 at 2:46 PM, CSD-CPU\egoveia posted (WT) (and emailed DLeath@ortc.com; kmackenzie@ortc.com on 8/1/2024 at 2:46 PM):
 REGARDING CITY AND COUNTY OF SAN FRANCISCO CODE ENFORCEMENT DOC#2018-K642319, 2019-K730948, 2019-K90683 AND 2016-K290398
 & 2019-K778900: Received email stating "The lien that were attached only reflected the amounts due that got assessed thru the property taxes. 200
 Naples has multiple complaints open and in order to abate the case all Notice of violations with HIS and CES must be corrected with approved final
 sign off, a Final Bill (FB) will not be generated until the corrections have been completed. Until the Final Bill is generated and paid, we will not remove
 the Order of Abatement. If you would like to speak to someone please feel free to contact me or CES at 626-652-3430" Tasks complete.

On 8/1/2024 at 9:18 AM, CSD-CPU\egoveia posted (WT): REGARDING CITY AND COUNTY OF SAN FRANCISCO CODE ENFORCEMENT
 DOC#2018-K642319, 2019-K730948, 2019-K90683: Sent request to email Elob.codeenforcement@sfgov.org via Internal Docs. P:(626) 652-3430.
 Tasked to follow up 8/5.

On 8/1/2024 at 8:56 AM, CSD-CPU\egoveia posted (WT): REGARDING CITY AND COUNTY OF SAN FRANCISCO CODE ENFORCEMENT
 DOC#2016-K290398 & 2019-K778900: Sent request to email Elob.codeenforcement@sfgov.org via Internal Docs. P:(626) 652-3430. Tasked to follow
 up 8/5.

Kathy MacKenzie, Escrow Officer

Denise Leath Team

ORTC LICENSE #2560-01

T: (916) 984-1380 EXT #5 | Fax: (916) 221-9005 | ShoreTel: 42408

1180 Iron Point Road, #190 | Folsom, CA 95630

**BEWARE! WIRE FRAUD IS ON THE RISE.**

Accepting wire and disbursement instructions via email can be dangerous,
 especially changes to those instructions. Always verify by calling the originator
 of the email using previously known contact information prior to sending funds.

Important Notice: The information contained in this email is private and confidential. It is intended only for the individual(s) named above. If you are not named above or are not an
 agency of the recipient(s), then you have received this email in error and to relieve, please do not copy this transmission or its attachment(s) is strictly prohibited by federal law. If you
 have received this email in error, please notify the sender by email immediately. If you are the proper recipient and this email contains "protected health information", you must abide
 by the rules of the HIPAA and other privacy laws that apply. Thank you for your attention to this notice.

Pat mg <bigblockpat@gmail.com>
 To: "Jonny W. Hornberger" <jhornberger@callahan-law.com>

Mon, Oct 7, 2024 at 12:39 PM

abatements....code enforcement can cancell these at any time
 [Quoted text hidden]



Pat mg <bigblockpat@gmail.com>

REVISED Building Permit Application# 202108096049 Invoice

1 message

DBIONLINESERVICES@sfgov.org <DBIONLINESERVICES@sfgov.org>

Wed, Dec 28, 2022 at 11:12 AM

To: BIGBLOCKPAT@gmail.com

Dear Permit Applicant,

Your permit is ready for issuance. Your invoice below was generated by Cheng Hong Chan.

INVOICE

Project:	200 NAPLES ST	Application#:	202108096049
Invoice Number:	20221214-122RL1	Invoice Date:	12/28/2022
Total Due:	\$2,248.67	Due Date:	Upon Receipt

FEE CODE	DESCRIPTION	FEE AMOUNT
BLDGSTD-I		

Bldg Stos Admin Spec Revolv Fund

\$1.00

REC RET-I Records Retention Fee DBI (Issuing) \$10.00

BLDG-I Bldg Permit Insp Fee (Issue) \$324.82

DCP-I DCP Plan Check (Issue) \$1,061.89

CURB Curb DPW \$180.00

DBI BOAS-I DBI Board of Appeals Surcharge (Issue) \$22.50

STRG MO-I Strong Motion Instrumentation Fee \$4.37

PLAN REV-I Plan Review (Issue) DBI \$612.59

DPW BOAS-I DPW Board of Appeals Surcharge (Issue) \$9.00

DCP BOAS-I DCP Board of Appeals Surcharge (Issue) \$22.50

Click here to pay your fees online. Please note that online payments are subject to a 2.5% convenience fee for credit card payments (minimum \$2.00). There is no convenience fee when paying by eCheck.

For ADU applications: Please submit payment online. Please refer to the separate email you received from Planning staff for additional information and contact CPC.ADU@sfgov.org if you have any questions.

Permit Details Report

Report Date: 2/24/2024 2:48:38 AM

Application Number: 202108096049

Form Number: 3

Address(es): 6008, 001, 0 200 NAPLES ST

Description: TO COMPLY WITH NOV #202175602: This proposal is for a new ADU in a single family residence, within the existing envelope. Restoration of existing curb cut per scope of work on.

Cost: \$33,599.56

Occupancy Code: R-3

Building Use: 28 - 2 FAMILY DWELLING

Disposition / Stage:

Action Date	Stage	Comments
8/9/2021	TRIAGE	
8/9/2021	FILING	
8/9/2021	FILED	
1/10/2023	APPROVED	
1/10/2023	ISSUED	

Contact Details:

Contractor Details:

Addenda Details:

Description:	Station	Rev#	Arrive	Start	In Hold	Out Hold	Finish	Checked By	Review Result	Hold Description
CP-GEN			8/9/21	8/9/21	8/9/21	8/11/21	8/11/21	BAEZA ROGELIO		PLANNING PERMIT Please contact rogelio.baeza@sfgov.org any questions. 8/11/21 APPLICATION ACCE INVITE SENT TO AP & AGENCIES TO JOI BLUEBEAM SESSION 8/9/2021: AWAITING PAYMENT.
HIS			8/11/21	8/9/22			8/9/22	LUTON MATT		
BID- INSP			8/11/21	8/17/21			8/17/21	MCHUGH KEVIN		no penalty
CES			8/11/21	8/14/21			8/14/21	GREENE EDWARD		ok to process eg
BID- INSP			11/18/22	11/18/22			11/18/22	BURKE KENNETH		ok to process
CP-ZOC			8/11/21	8/31/21	9/7/21	11/7/22	11/7/22	KWIATKOWSKA NATALIA		11/7/22: Approved 1st State program in an e single-family home. N work under this perm 9/29/22: project on-h pending response to c (curb cut and off-stre must be removed to a Variance and Appeal - NK. 1/4/22: project pending Variance; cor natalia.kwiatkowska@ - NK. 9/7/21: Placed pending comments. will.hughen@sfgov.org 8/26/21: assign to pla contact will.hughen@ - NK.
BLDG			8/11/21	9/14/21	9/14/21		9/29/22	HERNANDEZ HECTOR		Customer has yet to r comments as provide reminded ccustomer application form 3 for bluebeam has no refe number. conversation phone. original comm issued 9/14/2021 via ASSIGNED TO SUPE SPECIAL PROJECT.

SAN FRANCISCO ASSESSOR NEW CONSTRUCTION WORKSHEET

ASR INFORMATION

PROPERTY ADDRESS: 200 Napies St
 ASSESSORS PARCEL NUMBER: 6008 001
 PERMIT APPLICATION NUMBER: 201810183586 & 201808107053
 PERCENTAGE COMPLETE: 100%
 DATE OF VALUATION: September 3, 2020
 VALUED BY APPRAISER: Barry Kwan

DBI INFORMATION

PERMIT COST: \$100,000
 STATED COST:
 DESCRIPTION: To comply with nov 201895477 (bid). Structural strengthening include removing & replacing the floor framing. Remove 1 (e) dormer, add 2 (n) dormers on each side. demo (e) laundry at 2nd floor.

Instructions: Fill in non-shaded areas

Description of Work	Width (H)		Length (V)		Total	\$ PSF	Peter Daly		Value Added
	Feet	Inches	Feet	Inches			Quality	Level	
G/F			x		= 0.00 sc.ft.	x			\$ -
2020 PD Bsmt Conversion - In Law Unit			x		= 280.00 sc.ft.	x	\$ 115.00	Econ Med	\$ 32,200
*In-law is a studio used Econ/Med quality					= 0.00 sc.ft.				\$ -
2020 PD Add Interior Stairs			x		= 54.00 sc.ft.	x	\$ 428.00	Econ Med	\$ 23,112
*Used Econ quality because straight stairs			x		= 0.00 sc.ft.	x			\$ -
			x		= 0.00 sc.ft.	x			\$ -
			x		= 0.00 sc.ft.	x			\$ -
2/F			x		= 0.00 sc.ft.	x			\$ -
2020 PD Major Kitchen & Bath Remodel - Cong Fir Plan			x		= 326.00 sc.ft.	x	\$ 326.00	Econ High	\$ 106,276
*Used Econ/High due to smaller size and bath is not a full bath			x		= 0.00 sc.ft.	x			\$ -
			x		= sq.ft.	x			\$ -
			x		= 0.00 sc.ft.	x			\$ -
			x		= 0.00 sc.ft.	x			\$ -
3/F			x		= 0.00 sc.ft.	x			\$ -
2020 PD Attic Conversion with dormers			x		= 629.00 sc.ft.	x	\$ 436.00	Stan Med	\$ 274,244
*Includes stairs, room, and bath			x		= 0.00 sc.ft.	x			\$ -
			x		= 0.00 sc.ft.	x			\$ -
			x		= 0.00 sc.ft.	x			\$ -
			x		= 0.00 sc.ft.	x			\$ -
			x		= 0.00 sc.ft.	x			\$ -
			x		= 0.00 sc.ft.	x			\$ -
			x		= 0.00 sc.ft.	x			\$ -
			x		= 0.00 sc.ft.	x			\$ -
Property Becomes:			x		= 0.00 sc.ft.	x			\$ -
G/F: 1 Total Room, 1 Bath - 370sf			x		= 0.00 sc.ft.	x			\$ -
2/F: 3 Total Rooms, 1/2 Bath - 748sf			x		= 0.00 sc.ft.	x			\$ -
3/F: 2 Total Rooms, 2 Beds, 1 Bath - 529sf			x		= 0.00 sc.ft.	x			\$ -
Total: 6 Total Rooms, 3 Beds, 2.5 Baths - 1747sf			x		= 0.00 sc.ft.	x			\$ -
Lump Sum Adjustments									\$ -
									\$ -
									\$ -
TOTAL VALUE ADDITION					Construction area: 1,289 sq.ft.				\$ 436,832

Description of Work	Width		Length		Total	\$ PSF	Peter Daly		Value Subtracted
	Feet	Inches	Feet	Inches			Quality	Level	
Credit to existing GLA on G/F with 10 years life			x		= 280.00 sc.ft.	x	\$ 23.00		\$ 6,440
Credit to existing Interior stairs on G/F w 10 years life			x		= 54.00 sc.ft.	x	\$ 85.60		\$ 4,622
Credit to existing kit.bath on 2/F with 10 years life			x		= 326.00 sc.ft.	x	\$ 65.20		\$ 21,256
Credit to existing GLA in attic with 10 years life			x		= 629.00 sc.ft.	x	\$ 87.20		\$ 54,849
			x		= 0.00 sc.ft.	x			\$ -
			x		= 0.00 sc.ft.	x			\$ -
Lump Sum Credits									\$ -
									\$ -
									\$ -
TOTAL VALUE DEDUCTION					1289.00 sq.ft.				\$ 87,166

TOTAL VALUE	0 sq.ft.	\$	349,666
-------------	----------	----	---------

IN-PROGRESS CALCULATION (if applicable)	% COMPLETE	100%	\$ 349,000
---	------------	------	------------

Appointments:

Appointment Date	Appointment AM/PM	Appointment Code	Appointment Type	Description	Time Slots
5/17/2021	AM	WS	Web Scheduled	SITE VERIFICATION	1
8/27/2020	AM	WS	Web Scheduled	FINAL INSPECT/APPRVD	1

Inspections:

Activity Date	Inspector	Inspection Description	Inspection Status
5/17/2021	Thomas Keane	SITE VERIFICATION	EXPIRE
8/27/2020	Bernard Curran	FINAL INSPECT/APPRVD	PRE-FINAL
1/30/2020	William Walsh	SHEETROCK NAILING	REINSPECT REQUIRED

Special Inspections:

Addenda No.	Completed Date	Inspected By	Inspection Code	Description	Remarks
0	8/26/2020	MGREENE	18A	BOILTS INSTALLED IN EXISTING CONCRETE	
0	8/26/2020	MGREENE	18C	PULL/TORQUE TESTS PER SFBC SEC.1607C & 1615C	
0	8/26/2020	MGREENE	4	REINFORCING STEEL AND PRETRESSING TENDONS	reinforcing steel
0	7/29/2020	MGREENE	20	HOLDOWNS	
0	7/28/2020	MGREENE	24A	FOUNDATIONS	
0	7/28/2020	MGREENE	24E	WOOD FRAMING	
0	7/28/2020	MGREENE	19	SHEAR WALLS AND FLOOR SYSTEMS USED AS SHEAR DIAPHRAGMS	

For information, or to schedule an inspection, call 628-652-3400 between 8:30 am and 3:00 pm.

Station Code Descriptions and Phone Numbers

[Online Permit and Complaint Tracking home page.](#)

Technical Support for Online Services

If you need help or have a question about this service, please visit our FAQ area.

ASSESSORS DEPT

Permit Details Report**Report Date:** 12/29/2022 4:44:22 PM

Application Number: 201610183586
 Form Number: 3
 Address(es): 6008 / 001 / 0 200 NAPLES ST
 Description: TO COMPLY WITH NOV 201895477 (BID). STRUCTURAL STRENGTHENING INCLUDE REMOVING & REPLACING THE FLOOR FRAMING. REMOVE 1 (E) DORMER, ADD 2 (N) DORMERS ON EACH SIDE, DEMO (E) LAUNDRY AT 2ND FLOOR.
 Cost: \$100,000.00
 Occupancy Code: R-3
 Building Use: 27 - 1 FAMILY DWELLING

Disposition / Stage:

Action Date	Stage	Comments
10/18/2018	TRIALGE	
10/18/2018	FILING	
10/18/2018	FILED	
6/7/2019	APPROVED	
6/11/2019	ISSUED	
6/14/2019	SUSPEND	nsf check =1392
6/18/2019	REINSTATED	NSF CK=1392
5/17/2021	EXPIRED	5825177 Stage updated from inspection.

Contact Details:**Contractor Details:**

License Number: OWNER
 Name: OWNER
 Company Name: OWNER
 Address: OWNER * OWNER CA 00000-0000
 Phone:

Addenda Details:**Description:**

Step	Station	Arrive	Start	In Hold	Out Hold	Finish	Checked By	Hold Description
1	BID- INSP	10/18/18	10/18/18			10/18/18	HAJNAL STEVEN	
2	INTAKE	10/18/18	10/18/18			10/18/18	ROBINSON CHARLES	
3	CPB	10/25/18	10/25/18			10/25/18	GUTIERREZ NANCY	
4	CP-NP	2/20/19	4/18/19	2/20/19	2/22/19	4/18/19	CAMPBELL CATHLEEN	Emailed cover letter on 2/20/2019 (William) Mailed 311 notice on 3/4/2019; expires 4/3/2019 (William)
4	CP-ZOC	10/25/18	4/18/19			4/18/19	CAMPBELL CATHLEEN	Approved Dormers and New Fibrex Composite Windows_cathleen Campbell 4/18/19
5	BLDG	4/19/19	4/26/19			4/26/19		orc approved
6	BLDG	4/26/19	5/13/19			5/13/19		5/13/19: OTC expired
7	BLDG	5/13/19	5/20/19	5/20/19	5/23/19	5/23/19	LEUNG STEPHAN	approved after recheck
8	CP-ZOC	5/24/19	5/29/19			5/29/19	CAMPBELL CATHLEEN	Approved revisions no change-Cathleen. Campbell 5/29/19
9	PPC	5/29/19	5/29/19			5/29/19	CHAN EDDIE MAN WAI	5/29/19: to CPB; EC. 5/24/19: to DCP to review and stamp revised drawings; EC. 5/13/19: OTC expired, back to BLDG; am 4/29/19: Back to OTC bin; HP 4/29/19: to Patrick Gallagher; mmi 4/26/19: OTC request approved to OTC bin; HP 4/26/19: To supervisor for OTC approval/denial; HP 4/19/19: To BLDG; HP 2/11/19; R3 to DCP; mmi 2/5/19: R2 to DCP; am 1/17/19; R1 to DCP; mmi 10/25/18: To DCP: HP
10	CPB	5/29/19	6/7/19			6/11/19	YAN BRENDA	6/10/2019: UPDATED DATA IN PTS PER JD/BID. BYAN. 06/07/2019: SCHOOL FEE NOT REQ. CUSTOMER NEED TO SEE BID CHIEF OR SENIOR INSPECTOR BEFORE ISSUE. APPROV BY BYAN.

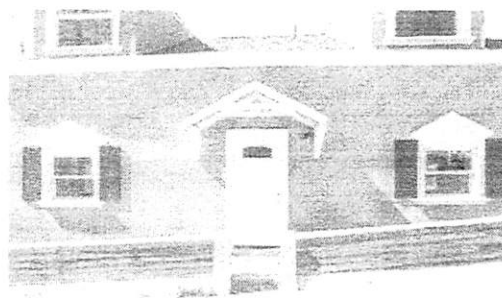
This permit has been issued. For information pertaining to this permit, please call 628-652-3450.

EXHIBIT C

EXHIBIT C

RESIDENTIAL
Detached

Cancelled List Price: \$1,188,000
 200 Naples Street Unit:
 SAN FRANCISCO CA 94112
 MLS# ML81334024 Stories: Two Story
 Orig Price: \$1,250,000 Sold Price:
 List Date: 3/14/2021 Off Mkt Date: 8/5/2021
 Pend Date: COE:
 D/N/S:
 DOM: 144 CDOM: 144
 Builder:



Naples St
Avalon Ave

Google

Map data ©2021

Print/Email:

Property Information

Bedrooms: 3	Yr Blt: 1907	Garage Spcs: 0	Total Rms:	Own Type:
Baths/Par: 2 / 1	Age: 114	Total Prk	# of Units:	% Own Occ:
SqFt: 2044	Acres: 0.057300	Fireplaces: Pool: No	Units Floor:	TIC %:
Source:	Lot SqFt: 2,495	ElemSchool Dist: San Francisco Unified	High School District: San Francisco Unified	

Showing & Listing Information

Occ By: Vacant	Occ Name:	Occ Phone:	Supra Box?:	Spec Info:
Show Info:		24 Hr. Notice Req?:	Lockbox Location:	
Directions:		Cross St: Avalon St	Associated Docs: 0	
List Type: Excl Right		List Service: Full Service	LA-DRE#: 00867442	
List Agt: Alex Lehr - Pref: 650-766-5300		alex@guiderealestateca.com	Broker DRE#:	
Co-List: Mike Aranda - Pref: 650-200-8259	List Ofc: Guide Real Estate - Primary: 650-766-5300		Agent Hit Count:	
Zoning: RH1 APN: 6008-001	Census Tract:	Point of Sale Ord:	City Transfer Tax: Ye	Client Hit Count:
Disclosures Link:	Showing Link:	Available to Show:		
Primary Showing Contact:	Primary Showing Phone:		Schedule a Showing	

*****Remarks*****

"Top of the Hill" Welcome to this Excelsior masterpiece on a premium corner lot! As you enter the two-story main home you will know you are home! Kitchen, dining, living room and half bath on the main floor with two bedrooms, full bath and city views on the upper level. This home has been completely rebuilt from the studs - enjoy the beauty of new construction while still having plenty of potential to plus the home of your dreams! 570 sq ft in law unit features a separate entrance with bedroom, bathroom, large kitchen and its own laundry hook-ups! Fenced backyard includes patio area with views and side gate access with room for 4 cars, RV parking and more opportunities are truly endless! Located moments away from Hwy 280 and McLaren Park, this is not one to miss!

*****Confidential Remarks*****

Agents- Vacant, staged and easy to show! Just book an appointment at <https://calendly.com/guiderealestate/> 30min and send your PEAD to gabriella@guiderealestateca.com. Presale has been opened with Katie Berggren- North American Title. Disclosure Link: <https://app.disclosures.io/link/200-Naples-Street-wmpqxyca>. This is a very versatile corner lot! Some options the owner has thought of: add additional square footage to two-story unit and keep the existing unit below and/or add a garage. Another option is adding a spiral staircase to connect the two units. Driveway access permit is in progress. Contact Mike Aranda 650-200-8259 (agent) for current status of permit. Seller is adjusting permits

Property Features:

BATH NON-PRMY INCLUDE	Stall Shower, Tile	POSSESSION	Close Of Escrow
COOLING	Ceiling Fan(s)	ROOF	Composition Shingles
CONSTRUCTION STATUS	Existing	ROOM - ADDITIONAL	Basement, Dining Area, Family Room
DISCLOSURES	Nat Hazard Disclosure	TERMS	Cash, Conventional, FHA Loan, VA Loan
EXTERIOR	Double Pane Windows	VIEWS	City Lights
FLOORING	Tile	WATER/SEWER	PublicSewer, Public Water
FOUNDATION	Slab	YARD DESCRIPTION	Back Yard, Fenced
HEATING	Forced Air 1 Zone		
KITCHEN FEATURES	220 Volt Outlet, Dishwasher, Eat-in Kitchen, Disposal, Microwave		

HOA Information

HOA?: No	HOA Name:	HOA Phone:	Fee \$:
Fee Freq:	Litigation:	Transfer Fees:	
HOA Amenities:			
HOA Documents:			
HOA Fees Include:			
Buyer Agent:			
Sale Price:	Sale/Orig \$:	Sale/Last \$:	List \$/SqFt: \$581 Sale\$/SqFt:
Concessions at COE:	Buyer Agent DRE#	# of offers:	Sale Terms:

Bay East, CCAR, bridgeMLS. Based on information from Bay East and Contra Costa Association of REALTORS® and bridgeMLS. All data, including all measurements and calculations of area, is obtained from various sources and has not been, and will not be, verified by broker or MLS. All information should be independently reviewed and verified for accuracy. If a floor plan is included, the floor plan is for illustrative purposes only, and the actual dimensions and layout of the home may differ from the floor plan. Buyer is urged to make a detailed inspection of the property, and if any aspect of a floor plan is critical to the buyer's

EXHIBIT E

EXHIBIT E

To: "O'Riordan, Patrick (DBI)" <patrick.oriordan@sfgov.org>

----- Forwarded message -----

From: **Pat mg** <bigblockpat@gmail.com>

Date: Tue, Oct 26, 2021 at 12:11 AM

Subject: Fwd: 200 Naples

[Quoted text hidden]

[Quoted text hidden]

Hughen, Will (CPC) <will.hughen@sfgov.org>

Tue, Oct 26, 2021 at 10:22 AM

To: bigblockpat <bigblockpat@gmail.com>

Cc: "Jones, Dario (CPC)" <dario.jones@sfgov.org>, "jneal_dc@comcast.net" <jneal_dc@comcast.net>

Hi there -

Often it takes several days to review information provided with other staff to ensure we are providing accurate information. We appreciate your patience.

Planning operates under "law of the day," which means the laws in places at the time of review apply to a given project.

Ordinance 95-17 is no longer active. Projects therefore can not approved with this ordinance at this time. This has been confirmed with my supervisor.

Please respond to this email once the applicant team has addressed previously sent planning comments.

Thanks - Will

Will Hughen, Senior Planner

Environmental Planning Division

San Francisco Planning

49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103

Direct: 628.652.7310 | www.sfplanning.org

[San Francisco Property Information Map](#)

Expanded in-person services at the Permit Center at 49 South Van Ness Avenue are available. Most other San Francisco Planning functions are being conducted remotely. Our staff are available by e-mail, and the Planning and Historic Preservation Commissions are convening remotely. The public is encouraged to participate. Find more information on our services [here](#).

[Quoted text hidden]

Tue, Oct 26, 2021 at 10:58 AM

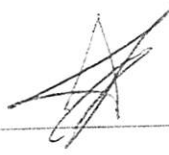
bigblockpat <bigblockpat@gmail.com>

To: "Hughen, Will (CPC)" <will.hughen@sfgov.org>

Cc: "Jones, Dario (CPC)" <dario.jones@sfgov.org>, "jneal_dc@comcast.net" <jneal_dc@comcast.net>

thats b.s. and you know it. 162-17 says the same thing only deals with forced evictions. the adu application specifically notes 95-17 as conforming ordinance for seismic retrofit buildings.
you cant choose not to follow the law will

[Quoted text hidden]



Tue, Oct 26, 2021 at 11:03 AM

bigblockpat <bigblockpat@gmail.com>

To: "Hughen, Will (CPC)" <will.hughen@sfgov.org>

Cc: "Jones, Dario (CPC)" <dario.jones@sfgov.org>, "jneal_dc@comcast.net" <jneal_dc@comcast.net>

[Quoted text hidden]



20211026_110258.jpg
2380K

bigblockpat <bigblockpat@gmail.com>

To: Evan Rosenbaum <rosenbaum@mosconelaw.com>

Tue, Oct 26, 2021 at 2:59 PM

[Quoted text hidden]

bigblockpat <bigblockpat@gmail.com>

To: Jon Tallerico <jontallerico@gmail.com>

Thu, Oct 28, 2021 at 10:29 AM

[Quoted text hidden]

bigblockpat <bigblockpat@gmail.com>

To: "Hughen, Will (CPC)" <will.hughen@sfgov.org>

Cc: "Jones, Dario (CPC)" <dario.jones@sfgov.org>, "jneal_dc@comcast.net" <jneal_dc@comcast.net>

Fri, Oct 29, 2021 at 10:25 AM

well....ive been calling around for 2 weeks now. cant find anyone with bluebeam. will need coments on pdf

[Quoted text hidden]

Jones, Dario (CPC) <dario.jones@sfgov.org>

To: bigblockpat <bigblockpat@gmail.com>

Cc: "jneal_dc@comcast.net" <jneal_dc@comcast.net>, "Hughen, Will (CPC)" <will.hughen@sfgov.org>

Fri, Oct 29, 2021 at 1:28 PM

Hi Pat,

I am going to reach out to you later this afternoon to discuss this matter. Are you available at 3 PM? Should 3 PM not work, please let me know your availability for next week.

Thanks,

Avalon front ??



Pat mg <bigblockpat@gmail.com>

200 naples st.

5 messages

Pat mg <bigblockpat@gmail.com>

Sat, Oct 30, 2021 at 12:35 PM

To: corey.teague@sfgov.org

hello. i am patrick gallagher. so for the last 6 mos ive been trying to get an adu approved for my property at 200 naples st. its a pretty long story, but ill try and keep it short.
so planning has told me that the zoning commissioner has determined that now Avalon is the front of my property. therefor i have to apply for a variance. Can you confirm that for me? it would seem very strange seeing that every house on naples faces naples including mine, but avalon is now the front. And if that is indeed the case, i need that determination for the variance application.
thank you.....patrick gallagher 925-325-3911

Pat mg <bigblockpat@gmail.com>

Sat, Oct 30, 2021 at 12:57 PM

To: Evan Rosenbaum <rosenbaum@mosconelaw.com>

[Quoted text hidden]

Kwiatkowska, Natalia (CPC) <natalia.kwiatkowska@sfgov.org>

Mon, Nov 1, 2021 at 2:55 PM

To: "bigblockpat@gmail.com" <bigblockpat@gmail.com>

Cc: "Teague, Corey (CPC)" <corey.teague@sfgov.org>, "Hughen, Will (CPC)" <will.hughen@sfgov.org>, "Jones, Dario (CPC)" <dario.jones@sfgov.org>

Hello Mr. Gallagher,

I am responding to your email below. Please refer to the attached email that clarifies Avalon Avenue to be the front of the property, sent on 10/19/21. A formal written determination can be requested from the Zoning Administrator through a Letter of Determination, if needed. The attached email also outlines two options for next steps.

I am copying Corey Teague, Zoning Administrator, Will Hughen, assigned planner, and Dario Jones, assigned Enforcement planner.

Please let us know if you have any follow-up questions or how you would like to move forward.

Thank you and stay well,

Natalia Kwiatkowska, Principal Planner**ADU Coordinator & Preservation Planner****Flex Team/Current Planning**

San Francisco Planning

49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103

Cc: jneal_dc@comcast.net

Subject: 200 Naples

Microsoft Teams meeting

Join on your computer or mobile app

[Click here to join the meeting](#)


Or call in (audio only)

+1 415-906-4659,,621248003# United States, San Francisco

Phone Conference ID: 621 248 003#

[Find a local number](#) | [Reset PIN](#)

[Learn More](#) | Meeting options

 **Fw: 200 Naples.eml**
59K

Pat mg <bigblockpat@gmail.com>

Tue, Nov 2, 2021 at 11:25 AM

To: "Kwiatkowska, Natalia (CPC)" <natalia.kwiatkowska@sfgov.org>

Cc: "Teague, Corey (CPC)" <corey.teague@sfgov.org>, "Hughen, Will (CPC)" <will.hughen@sfgov.org>, "Jones, Dario (CPC)" <dario.jones@sfgov.org>

well....here's the thing. attatched is a copy of my adu application. 95-17 is the governing ordinance and is quoted 3 times as such. my property does comply with 95-17 and was always meant to specifically. thats why i spent 10s of thousands to do a voluntary siesmic retrofit. also i spoke with the city attorneys office, and they assured me that 95-17 is indeed in effect and there is no such thing as day law.

ill go ahead and apply for the variance. but 95-17 is the law gentlemen

[Quoted text hidden]

Pat mg <bigblockpat@gmail.com>

Tue, Nov 2, 2021 at 11:34 AM

To: "Kwiatkowska, Natalia (CPC)" <natalia.kwiatkowska@sfgov.org>

Cc: "Teague, Corey (CPC)" <corey.teague@sfgov.org>, "Hughen, Will (CPC)" <will.hughen@sfgov.org>, "Jones, Dario (CPC)" <dario.jones@sfgov.org>

here is the adu app

[Quoted text hidden]

2 attachments

adu application 001.jpg
1051K

Direct: 628.652.7306 | www.sfplanning.org

San Francisco Property Information Map

From: Pat mg <bigblockpat@gmail.com>
Sent: Saturday, October 30, 2021 12:35 PM
To: Teague, Corey (CPC) <corey.teague@sfgov.org>
Subject: 200 naples st.

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

[Quoted text hidden]

----- Forwarded message -----
From: "Hughen, Will (CPC)" <will.hughen@sfgov.org>
To: "Kwiatkowska, Natalia (CPC)" <natalia.kwiatkowska@sfgov.org>
Cc:
Bcc:
Date: Mon, 1 Nov 2021 21:01:03 +0000
Subject: Fw: 200 Naples
See below - thanks!
Best - Will

Will Hughen, Senior Planner
Environmental Planning Division

San Francisco Planning
49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103
Direct: 628.652.7310 | www.sfplanning.org
San Francisco Property Information Map

From: Hughen, Will (CPC) <will.hughen@sfgov.org>
Sent: Tuesday, October 19, 2021 10:23 AM
To: bigblockpat <bigblockpat@gmail.com>; megohalloran4@gmail.com <megohalloran4@gmail.com>; Jones, Dario (CPC) <dario.jones@sfgov.org>
Cc: jneal_dc@comcast.net <jneal_dc@comcast.net>
Subject: Re: 200 Naples

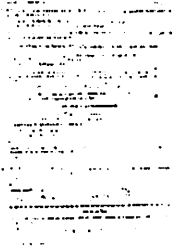
Hi there -

I have reviewed the rear yard topic with the Zoning Administrator. Based on the discussion the Zoning Administrator considers Avalon Avenue to be the front of the property. This is because treatment of Avalon Avenue as the front of the property results in an existing building and property that is significantly more code-compliant compared to if Naples Street was treated as the front of the property.

As such, the previously issued comments regarding the automobile parking in the required rear yard and the curb cut still apply to the proposed project.

Here are the options for moving forward (regarding the parking and curb cut):

- Option 1: File a variance for the automobile parking within the required rear yard area.
- Option 2: Move the automobile parking and curb cut out of the required rear yard area.



adu application 002.jpg
811K



NEED
Samsung copy

WILL HUGHEN
NATALIA

Pat mg <bigblockpat@gmail.com>

200 naples

23 messages

bigblockpat <bigblockpat@gmail.com>
To: "Hughen, Will (CPC)" <will.hughen@sfgov.org>

Fri, Dec 10, 2021 at 11:29 AM

hey will...can you call me? 925 325 3911

Sent from my Verizon, Samsung Galaxy smartphone

Kwiatkowska, Natalia (CPC) <natalia.kwiatkowska@sfgov.org>
To: "bigblockpat@gmail.com" <bigblockpat@gmail.com>
Cc: "Jones, Dario (CPC)" <dario.jones@sfgov.org>

Mon, Dec 13, 2021 at 3:43 PM

Moving Will to bcc and copying Dario.

Hello Mr. Gallagher,

I'm responding to your message to Will, below. Please note that Will has transitioned into another Division in our Department. As such, your ADU permit will be re-assigned to a new planner along with the Variance application that you submitted.

In the meantime, please address the comments issued for the ADU permit in the Bluebeam Session. Will has shared these comments with you and I am including them again (please see attached) for easy access. Below is a link to the Bluebeam Session:

200 NAPLES ST - 202108096049

Session ID: 251-188-191

Session URL: <https://studio.bluebeam.com/join.html?ID=251-188-191>

Please inform all of your plan reviewers one you have responded to the comments and uploaded new plans. To check status of your permit or who your plan reviewers are, please review the Department of Building Inspection (DBI) permit tracking website.

Please let me know if you have any questions. I'm happy to schedule a call if you'd like.

Thank you and stay well,

Natalia Kwiatkowska, Principal Planner

ADU Coordinator & Preservation Planner**Flex Team/Current Planning**

San Francisco Planning

49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103


Direct: 628.652.7306 | www.sfplanning.org

San Francisco Property Information Map

From: bigblockpat <bigblockpat@gmail.com>
Sent: Friday, December 10, 2021 11:29 AM
To: Hughen, Will (CPC) <will.hughen@sfgov.org>
Subject: 200 naples

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

[Quoted text hidden]

 **Plans - 200 NAPLES ST (1 of 4)_additional agency comments.pdf**
4100K

bigblockpat <bigblockpat@gmail.com>
To: "Kwiatkowska, Natalia (CPC)" <natalia.kwiatkowska@sfgov.org>
Cc: "Jones, Dario (CPC)" <dario.jones@sfgov.org>

Mon, Dec 13, 2021 at 4:19 PM

yes...i would appreciate a phone call before i attempt this bluebeam session....i can tell you that i did all this in pdf months ago. but ill try the bluebeam thing.
925 325 3911

Sent from my Verizon, Samsung Galaxy smartphone

[Quoted text hidden]

bigblockpat <bigblockpat@gmail.com>
To: "Kwiatkowska, Natalia (CPC)" <natalia.kwiatkowska@sfgov.org>

Tue, Dec 14, 2021 at 1:37 AM

Miss Natalia....this woke me up....
Will could have sent me the bluebeam session 6 months ago...why didnt he?

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Kwiatkowska, Natalia (CPC)" <natalia.kwiatkowska@sfgov.org>
Date: 12/13/21 3:44 PM (GMT-08:00)
To: bigblockpat@gmail.com
Cc: "Jones, Dario (CPC)" <dario.jones@sfgov.org>
Subject: RE: 200 naples

[Quoted text hidden]

bigblockpat <bigblockpat@gmail.com>
To: "Kwiatkowska, Natalia (CPC)" <natalia.kwiatkowska@sfgov.org>

Tue, Dec 14, 2021 at 9:41 AM

Meaghan quit out of frustration as did my draftsperson John....neither of them had bluebeam. i dont either.....and yes i would still like to talk on the phone first before i attempt the bluebeam thing

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Kwiatkowska, Natalia (CPC)" <natalia.kwiatkowska@sfgov.org>
Date: 12/14/21 9:12 AM (GMT-08:00)
To: bigblockpat <bigblockpat@gmail.com>
Subject: RE: 200 naples

Hello again,

In your application materials, Meghan O'Halloran was listed as the primary project contact; therefore, Meghan was invited to the Bluebeam Session on 8/11/21.

Is there a new design professional you are working with that you would like for me to invite to this Bluebeam Session if Meghan is no longer the primary contact?

Finally, would you still like to chat? I can give you a call today. Please let me know your availability.

[Quoted text hidden]

bigblockpat <bigblockpat@gmail.com>
To: "Kwiatkowska, Natalia (CPC)" <natalia.kwiatkowska@sfgov.org>

Tue, Dec 14, 2021 at 11:19 AM

you can call anytime 925 325 3911

[Quoted text hidden]

bigblockpat <bigblockpat@gmail.com>
To: "Kwiatkowska, Natalia (CPC)" <natalia.kwiatkowska@sfgov.org>

Tue, Dec 14, 2021 at 12:14 PM

again...can you please send me the ordinance that negates 95-17

[Quoted text hidden]

bigblockpat <bigblockpat@gmail.com>
To: "Kwiatkowska, Natalia (CPC)" <natalia.kwiatkowska@sfgov.org>

Wed, Dec 15, 2021 at 12:29 PM

so...will didnt forward any of the files to you?...i sent him everything back in july

[Quoted text hidden]

bigblockpat <bigblockpat@gmail.com>
To: "Kwiatkowska, Natalia (CPC)" <natalia.kwiatkowska@sfgov.org>
Cc: "Jones, Dario (CPC)" <dario.jones@sfgov.org>

Wed, Dec 15, 2021 at 1:53 PM

that doesnt apply at all...the water and sewage are perfectly adequate and is supplied by the city. 65852.2 does not apply